



**U.S. Department of Justice  
Tax Division**

*Western Criminal Enforcement Section  
P.O. Box 972 202-514-5762 (v)  
Washington, D.C. 20044 202-514-9623 (f)*

---

May 10, 2021

**VIA EMAIL**

Kathy Keneally  
kkeneally@jonesday.com

*Re: United States v. Robert T. Brockman, 4:21-cr-009-GCH*

Dear Ms. Keneally:

We intend on asking the Court to order early production of records from the following parties that have been subpoenaed but have yet to produce records:

- Amegy Bank
- Baylor College of Medicine
- Burnett, Robert
- Chandler, Bart
- Jackson, James
- Lai, Eugene\*
- Moss, Craig
- UCSH
- University of Texas Health & Science
- Yudofsky, Stuart\*

Most of the outstanding subpoenas request non-medical records, but the asterisks note subpoenas that request medical records. The subpoenas to Baylor and Dr. Yudofsky are covered by our January 26 Motion (ECF 26), but the remaining parties are not listed in that motion.

We write this letter to ask your position on the issuance of Rule 17(c) orders compelling early production from the parties listed above.

Very truly yours,  
DAVID A. HUBBERT  
ACTING ASSISTANT  
ATTORNEY GENERAL

s/ Corey J. Smith  
COREY J. SMITH  
Senior Litigation Counsel